

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

ADRIANA M. CASTRO, M.D., P.A. and
SUGARTOWN PEDIATRICS, LLC, *et al.*,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

SANOFI PASTEUR INC.,

Defendant.

No. 13 C 2086

Judge John J. Tharp, Jr.

**AFFIDAVIT OF ADRIANA M. CASTRO, M.D.,
REGARDING HER RETENTION OF
BERGER & MONTAGUE P.C. IN CONNECTION WITH THIS LAWSUIT**

I, Adriana M. Castro, M.D., state as follows:

1. I am the principal of Adriana M. Castro, M.D., P.A., a pediatric office located in Miami, Florida and a plaintiff in this lawsuit. I make this Affidavit based on my personal knowledge. If called as a witness, I could and would competently testify to the matters stated herein.

2. On November 30, 2011, I executed a retainer agreement with Criden & Love, P.A. for legal services in connection with the matters at issue in this lawsuit. *See* Criden & Love, P.A. retainer agreement, attached hereto as Exhibit "A." Prior to executing the agreement, it was explained to me that Criden & Love, P.A. would be working with other firms including, but not limited to, Grant & Eisenhofer P.A. and Berger & Montague P.C., and that all of these firms would represent my practice for the purposes of this litigation. On November 30, 2011, Eric Cramer of Berger & Montague

P.C. sent a draft complaint to Criden & Love, P.A. to send to me. *See* November 30, 2011 transmittal email, attached hereto as Exhibit "B."

3. Accordingly, it is my understanding that I formally retained Berger & Montague P.C. to provide legal services in connection with the matters at issue in this lawsuit on November 30, 2011, when I executed the Criden & Love, P.A. retainer agreement.

4. On December 9, 2011, the initial complaint in this lawsuit was filed on my behalf and the behalf of the proposed class by Berger & Montague P.C., among other firms.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

A handwritten signature in cursive script, appearing to read "Adriana M. Castro", written in black ink.

Adriana M. Castro, M.D.

EXHIBIT A

CRIDEN & LOVE, P.A.
ATTORNEYS AT LAW

7301 SOUTHWEST 57th COURT
SUITE 516
SOUTH MIAMI, FLORIDA 33143
TELEPHONE (305) 357-9000
FACSIMILE (305) 357-9050

November 30, 2011

Dr. Adriana M. Castro M.D.
Allied Pediatrics LLP
9220 S.W. 72nd Street, Suite 102
Miami, FL 33173-3015

Re: Vaccines Class Action

Dear Dr. Castro:

This is to confirm your agreement to retain the firm of Criden & Love, P.A. ("C & L") and Grant & Eisenhofer P.A. to represent you as a class representative against Sanofi Pasteur, Inc. and other defendants. We truly appreciate the trust and confidence you have placed in our firms to represent you in this matter.

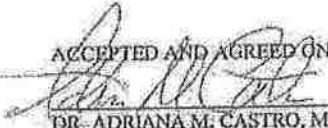
As a class representative plaintiff, you may be asked to cooperate in any factual inquiries we may undertake concerning this case. Your deposition may also be required in connection with your purchase of the products in question. We will keep you closely informed about the lawsuit and seek your input with regard to various issues, including any potential settlements. We will also represent you in any matter in the litigation affecting your status as a class representative. If the case is certified as a class action, our fees and expenses would be awarded by the court out of any recovery obtained. We will advance any and all expenses related to the case. You will therefore have no financial responsibilities to the firm. As in any case, the firm reserves the right to withdraw from representation at any time in the event we determine it is no longer practical or financially feasible to continue with the case. While we do not anticipate this occurring, should the firm decide to discontinue its representation, you would owe us nothing for the time and expenses incurred.

Please acknowledge your understanding of the above by signing where indicated. Should you have any questions please feel free to call me at any time.

Sincerely,


MICHAEL E. CRIDEN

ACCEPTED AND AGREED ON THIS 30 DAY OF NOVEMBER, 2011.


DR. ADRIANA M. CASTRO, M.D.
ALLIED PEDIATRICS LLP.

LaVA/CJMS/est/mae.vpd

EXHIBIT B

Kevin B. Love

From: Eric Cramer <ecramer@bm.net>
Sent: Wednesday, November 30, 2011 11:11 AM
To: Kevin Love; mecriden59@aol.com
Cc: John D. Radice; Linda P. Nussbaum
Subject: Sanofi
Attachments: Menactra Complaint 11 30 2011.doc

Folks:

Here is a draft of the complaint for the good doctor to review and discuss.

I'm available this afternoon or tomorrow generally.

Let me know.

--Eric

Eric L. Cramer | *direct* 215/875-3009 | *direct fax* 702/995-4658 | *mobile* 215-327-9583
Berger & Montague, P.C. | 1622 Locust Street | Philadelphia, PA 19103-6305
phone 215/875-3000 | *bergermontague.com*

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